

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

| | | |
|-----------------------------------|---|---------------------|
| INTEGRATED GLOBAL SERVICES, INC., |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | C.A. No. _____ |
| |) | |
| CORMETECH, INC., |) | |
| |) | |
| Defendant. |) | JURY TRIAL DEMANDED |
| |) | |

DECLARATION OF JEFF SHELTON

I, Jeff Shelton, declare as follows:

1. I am over the age of eighteen years and am otherwise competent to testify.
2. I am the Vice President of IGS Environmental at Integrated Global Services, Inc. (“IGS”).
3. I make this declaration based on my personal knowledge or have inquired into and been informed of the facts stated herein and, if called to testify to the truth of the matters declared herein, I could and would testify competently.
4. Dennis Thornfinnison of Basin Electric’s Dry Forks facility informed me that Cormetech offered for sale a protective catalyst screen identical to IGS’s proprietary catalyst screen design.
5. Ian Mylenbush of Southern Company informed me that Cormetech offered for sale a protective catalyst screen identical to IGS’s proprietary catalyst screen design.
6. During a conversation with Jake Holeva of Hendrick Manufacturing Company, Jake informed me that Cormetech attempted to purchase from Hendrick the exact protective catalyst screen that Hendrick manufactures for IGS. Jake informed me that Hendrick supplied Cormetech with a quote for the order and subsequently discovered that the pricing for the quote

173

was based on using IGS's tooling equipment. Hendrick could not honor the price of the quote without using the tooling that belongs solely to IGS and, therefore, revoked the quote.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on September 4, 2020



Jeff Shelton